



**CSI INTERNATIONAL, INC.**  
201 HANGAR ROAD  
AVOCA, P4 18641 U.S.A.

**ORIGINAL**

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FEDERAL MARITIME COMMISSION  
SECRETARY

**September 9, 2003**

**Honorable Bryant L Van Brakle  
Secretary  
Federal Maritime Commission  
800 North Capitol Street, N.W.  
Washington DC 20573**

**RE: Petition of National Customs Brokers and Forwarders  
Association of America, Inc. for a Limited Exemption from  
Certain Tariff Requirements of the Shipping Act of 1984**

**Petition No. 03-P5-03**

**Dear Secretary Van Brakle:**

**I am Catherine D. Delaney, President of CSI International, Inc.**

**We are a customs broker, freight forwarder and NVOCC, OTI  
license-number 4250. We have two offices in the USA and work with a  
number of overseas agents on both export and import ocean cargo.**

**I estimate we incurred the following costs regarding our tariff:**

- a) Average of US\$1960 per year to subscribe to a tariff publishing service,**
- b) Eight man hours per month maintaining the information,**
- c) We do not charge anyone to access our tariff,**
- d) We are not able to determine if someone has accessed our tariff but since its inception no one has asked us how to do so.**

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**I estimate rates are separately negotiated with shippers – as opposed to using those already in our tariff – at more than 98%.**

**Tariffs are not useful to CSI International, Inc. or to our customers because the rates are constantly in a state of flux, depending on the season and quantity shipped, to name just two factors. With the demands of today's marketplace we can not simply offer a customer a rate that applied even a month previous. We must re-examine the various carriers to determine their current rate levels and quote our customer accordingly. Therefore, an item may be entered into our tariff, never to be used even a second time!**

**I, Catherine D. Delaney, declare under penalty of perjury that the foregoing is true and correct. Further I certify that I am qualified and authorized to file this verified statement.**

**Executed on September 9<sup>th</sup>, 2003**

**Catherine D. Delaney**